

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

JENNIFER HAYES,)	
Plaintiff,)	
)	
v.)	
)	
FORD MOTOR COMPANY)	Case No.:
)	
and)	
)	Removed from: Circuit Court of Jackson
CORPORATE SERVICES HOLDINGS,)	County, Missouri at Independence
INC., d/b/a BARTECH)	Case No.: 2116-CV20018
)	
and)	
)	
KWEON PANGYU)	
Defendants.)	
)	

NOTICE OF REMOVAL

COMES NOW Defendant Corporate Services Holdings, Inc., d/b/a Bartech (hereinafter referred “Bartech”, and hereby gives notice pursuant to 28 U.S.C. §§ 1446, 1441(a)&(b), and 1332(a), by and through its undersigned attorneys, that it is removing this action to the United States District Court for the Western District of Missouri, Western Division. The basis for the Removal of this action is that based upon information and belief, there is diversity of citizenship and the amount in controversy, exclusive of interest and costs, exceeds \$75,000.

In support of its Notice of Removal, Corporate Services states as follows:

1. On or about September 16, 2021, Plaintiff Jenifer Hayes filed a Petition against Defendants Corporate Services Holdings, Inc., d/b/a Bartech, Ford Motor Company (hereinafter “Ford”) and Kweon Pangyu in the Circuit Court of Jackson County, State of Missouri, Cause No. 2116-CV20018.

2. The action in state court against Defendants is a civil Petition alleging negligence and negligence *per se* for the actions Bartech and Ford's alleged agent and joint employee, Kweon Pangyu, on February 23, 2020. The specific allegations against Defendants are contained in Plaintiff's Petition. *See* Plaintiff's Petition, attached as Exhibit A. As a result of the alleged wrongful acts of Defendants, Plaintiff Jennifer Hayes claims she suffered numerous serious and painful bodily injuries, including her neck, spine, and shoulder, resulting in severe pain and suffering, severe mental anguish, and emotional distress. *See* Exhibit A, ¶¶ 14-27.

3. This Notice of Removal is brought pursuant to 28 U.S.C. §§ 1446, 1441(a)&(b), and 1332(a). Pursuant to § 1332(a), the district courts shall have original jurisdiction in all actions where the matter in controversy exceeds the sum or value of \$75,000 and is between citizens of different states. As set forth in §§ 1446(b)(2)(A) and 1441(b)(2), an action based on diversity of citizenship may be removed if all defendants that are properly joined and served join in or consent to the removal and are not citizens of the State in which the action was brought.

4. Plaintiff Jennifer Hayes is a citizen of Missouri. *See* Exhibit A, ¶ 1.

5. Defendant Ford Motor Company is a citizen of Michigan and Delaware as its principal place of business is located in Dearborn, Michigan and it is incorporated in Delaware.

6. Defendant Corporate Services Holdings, Inc., d/b/a Bartech is a citizen of Georgia and Delaware as its principal place of business is located in Atlanta, Georgia and it is incorporated in Delaware

7. Defendant Kweon Pangyu is a citizen of Michigan. *See* Exhibit A, ¶ 4. As of this Notice, he has not been served and properly joined as a party to the present action.

8. Therefore, Plaintiff is a citizen of Missouri, Defendant Ford is a citizen of Michigan and Delaware, Defendant Bartech is a citizen of Georgia and Delaware and Defendant

Pangyu is a citizen of Michigan, meaning complete diversity of citizenship exists, and this Court, therefore, has subject-matter jurisdiction.

9. In her Petition, Plaintiff claims no specific amount for damages. *See* Exhibit A. However, in a demand letter, Plaintiff makes a demand for “policy limits.” *See* Plaintiff’s demand letter, attached as Exhibit B. The policy limit on the applicable policy from Defendant Bartech is \$1,000,000.

10. Co-Defendant Ford consents to this Removal as showing the Consent to Removal, which is attached as Exhibit C.

11. Therefore, since complete diversity exists amongst the parties, the amount in controversy exceeds \$75,000, and all defendants properly served join in this notice, the Western District of Missouri has original jurisdiction and this matter should be removed.

12. As required by 28 U.S.C. § 1446(a), a copy of the complete state court file of this case, including process, pleadings, and orders are attached as Exhibit D.

WHEREFORE, Corporate Services Holdings, Inc., d/b/a Bartech, hereby removes this case from the Circuit Court of Jackson County, in Independence, State of Missouri to this Honorable Court and respectfully requests that hereafter this Court exercise jurisdiction over this matter.

Respectfully submitted,

WIEDNER & MCAULIFFE, LTD.

/s/ Brent L. Salsbury
C. Zachary Vaughn, #56408
Brent L. Salsbury, #58194
WIEDNER & MCAULIFFE, LTD.
101 S. Hanley, Suite 1450
St. Louis, Missouri 63105
(314) 721-3400 – telephone
(314) 725-5755 – fax

czvaughn@wmlaw.com
blsalsbury@wmlaw.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served the ____ day of October 2021, via this Court's electronic filing system, to the following:

John M. Cusick
Kyle S. Belew
BARNES LAW FIRM, LLC
919 West 47th Street
Kansas City, MO 64112
Ph: (816) 221-4321
Fx: (816) 471-4321
jcusick@law4321.com
kbelew@law4321.com
Attorneys for Plaintiff

Stephen M. Bledsoe,
BERKOWITZ OLIVER, LLP
2600 Grand Blvd., Ste 1200
Kansas City, Missouri 64108
(816) 561-7007
sbledsoe@berkowitzoliver.com
Attorneys for Defendant Ford Motor Company

/s/ Brent L. Salsbury _____